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BY MAIL

August 19, 2008

Hon. Harold Baer
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: United States v. Charlene Marant
Ind. No. 07 Cr. 160 (HB)

Dear Judge Baer,

I was assigned as C.J.A. counsel to represent defendant Charlene Marant (hereinafter "defendant") on August 7, 2008. She has already pleaded guilty, and her sentencing is currently scheduled for September 4, 2008. I may be actually engaged on that date, as I am currently scheduled to be starting a one-to-two-week jury trial in New York Supreme Court on September 3, 2008. In any event, I am respectfully requesting an adjournment of defendant's sentencing for sixty days, due to the facts that : (1) there are a large number of documents to be reviewed by me in connection with this case, including those relating to the defendant's competence to proceed; (2) I have been advised that there are a number of new legal matters, relative to her sentencing, that this new client wishes to discuss with me in detail; (3) the defendant's final PSR has still not been completed; and (4) I am committed to doing a substantial amount of work on other legal matters – both trials and appeals – that came up prior to my being appointed in this case. I have spoken with AUSA Harrington, who consents to the adjournment, and we have agreed to inform the Court on the status of the case as we proceed.

With respect to the preparation of the PSR, I have been informed that, although USPO Dunne

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has made a first disclosure of the PSR, defendant has not yet completed the required financial documents, nor submitted certain necessary documents relating to her personal history. My associate, Jason Yang, Esq., has asked USPO Dunne for new forms, so that defendant can complete and then submit these materials to Probation Department.

I believe that sixty days will be sufficient time for me to complete my review of the necessary documents, to hold the meetings that I must have with defendant, to complete and submit all documents required by the Probation Department, and to prepare a Pre-Sentence Memorandum that will be of use to the Court in determining the appropriate sentence to imposed in this case.

Respectfully submitted,



Steven R. Kartagener

cc: AUSA William Harrington

Oct 20 at 11 AM
No more admissions &
likely no more psychological
exams at government expense;
much of your coverage should
have been completed by Mr. Melo;

SO ORDERED:


Harold Baer, Jr., U.S.D.J.

Date: 8/21/08

Endorsement:

October 20 at 11:00 A.M. no more adjournments and likely no more psychological exams at government expense. Much of your concerns should have been completed by Mr. Anello.